

1 J. Randall Jones (Nev. Bar No. 1927)  
2 Michael J. Gayan (Nev. Bar No. 11135)  
3 KEMP, JONES & COULTHARD, LLP  
3800 Howard Hughes Parkway, 17th Floor  
3 Las Vegas, Nevada 89169  
4 T: (702) 385-6000  
4 F: (702) 385-6001  
5 r.jones@kempjones.com  
5 m.gayan@kempjones.com  
6

7 *Attorneys for Plaintiff*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 LUZ ELENA CUADROS, on behalf of herself )  
11 and all others similarly situated, ) Case No. 2:16-CV-2025 JCM (VCF)  
12 Plaintiff, )  
13 vs. )  
14 STATE FARM FIRE AND CASUALTY ) **STIPULATION RE: HEARING ON**  
15 COMPANY, ) **DEFENDANT'S MOTION FOR**  
16 Defendant. ) **PROTECTIVE ORDER (DKT. 56)**  
17 ) **AND PLAINTIFF'S MOTION TO**  
18 ) **COMPEL DISCOVERY (DKT. 65)**  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

---

18 COME NOW the Parties, by and through their undersigned attorneys, and respectfully ask  
19 the Court to move the hearing on Defendant State Farm's Motion for Protective Order (Dkt. 56)  
20 and Plaintiff's Motion to Compel (Dkt. 65) from 3:00 p.m. on September 6, 2017, to 8:30 a.m. on  
21 September 6, 2017. In support of their stipulation, the Parties state as follows:

22 1. On July 31, 2017, the Court held a hearing on the Motion to Vacate the Order on  
23 Motion for Protective Order (Dkt. 59). At the conclusion of the hearing, the Court set argument on  
24 the Motion for Protective Order and Motion to Compel for 10:00 a.m. on September 6, 2017.

25 2. On August 23, 2017, the Court issued a Minute Order (Dkt. 72) setting a hearing  
26 on Defendant State Farm's Motion to Dismiss and Plaintiff's Motion to Compel Discovery for  
27 3:00 p.m., on Wednesday, September 6, 2017.

1       3. Upon receipt of the foregoing Minute Order, Counsel for Parties conferred and, due  
2 to preexisting conflicts that would prevent some counsel from attending the hearing, the parties  
3 agreed to request that the hearing be moved up to at 8:30 a.m. that same day.

4           WHEREFORE, the Parties jointly request that the hearing on Defendant State Farm's  
5 Motion for Protective Order and Plaintiff's Motion to Compel Discovery be set for 8:30 a.m. on  
6 Wednesday, September 6, 2017.  
7

8 Dated: August 24, 2017

Respectfully submitted,

9           /s/ Michael J. Gayan  
J. Randall Jones  
Michael J. Gayan  
10 KEMP, JONES & COULTHARD, LLP  
Wells Fargo Tower  
11 3800 Howard Hughes Parkway  
Seventeenth Floor  
12 Las Vegas, Nevada 89169  
Telephone: (702) 385-6000  
13 Fax: (702) 385-6001  
r.jones@kempjones.com  
m.gayan@kempjones.com  
14 *On behalf of Plaintiff and Plaintiff's Counsel*  
15

16           /s/ Riley A. Clayton  
Riley A. Clayton (Nevada Bar No. 005260)  
17 HALL JAFFE & CLAYTON, LLP  
7425 Peak Drive  
18 Las Vegas, NV 89128  
Telephone: (702) 316-4111  
19 Fax: (702) 316-4114  
rclayton@lawhjc.com

20 Todd A. Noteboom (*pro hac vice*)  
Jeffrey G. Mason (*pro hac vice*)  
150 South Fifth Street, Suite 2300  
21 Minneapolis, MN 55402  
Telephone: (612) 335-1500  
22 Fax: (612) 335-1657  
todd.noteboom@stinson.com  
jeffrey.mason@stinson.com

23 IT IS HEREBY ORDERED THAT THE  
24 HEARING IS RESCHEDULED TO  
25 8:30 am, September 6, 2017.

26 IT IS SO ORDERED  


27           UNITED STATES MAGISTRATE JUDGE  
28

Dated: 8-24-2017, 2017